

ATTACHMENT A

Interrogatories to Moving
Defendants

Interrogatories to Merchant Companies
and Blue Rocket Brands (Identical Set
Served on 56 Companies)

DAVID C. SHONKA
Acting General Counsel
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop CC-9528
Washington, DC 20580
Telephone: 202-326-3444 (Waldrop)
Telephone: 202-326-3515 (Schaefer)
Facsimile: 202-326-3197
Email: swaldrop@ftc.gov, mschaefer@ftc.gov

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar No. 4790
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: 702-388-6336
Facsimile: 702-388-6787
Email: blaine.welsh@usdoj.gov

Attorneys for Plaintiff Federal Trade Commission.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	PLAINTIFF FTC'S FIRST SET OF
)	INTERROGATORIES TO DEFENDANT
REVMOUNTAIN, LLC, <i>et al.</i> ,)	ABSOLUTELY WORKING, LLC
)	
Defendants.)	
)	

Plaintiff, Federal Trade Commission, propounds the following First Set of Interrogatories to Defendant Absolutely Working, LLC pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure. The Definitions herein are provided for guidance and to reduce the likelihood of any misunderstanding regarding the specific interrogatories set forth below, and are not intended to increase the burden otherwise imposed by the Federal Rules of Civil Procedure upon the defendant as the responding party. Pursuant to Federal Rule of Civil

Procedure 33(b)(2), Absolutely Working, LLC must serve the Commission with its responses under oath to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant Absolutely Working, LLC is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

DEFINITIONS

A. **"Defendants"** means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.

B. **"Identify," "identifying,"** and **"identification"** mean:

1. When referring to a natural person, state the full name, present business address and telephone number, or if a present business affiliation or business address is not known, by the last known business and home addresses and business and home telephone numbers;

2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and

3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.

C. “You” and “Your” mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

INTERROGATORIES

1. Describe the business activities You engage in.
2. Identify all of Your members.
3. Identify all of Your officers.
4. Identify all of Your employees.
5. Identify all products or services You marketed or sold.
6. Identify all suppliers from which You obtained any goods You marketed or sold to consumers.
7. Identify all of the websites You used to market or sell products or services.
8. Identify all of the customer relationship management systems You used to manage Your relationships and interactions with customers and potential customers.
9. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.
10. Identify any contracts You have with other Defendants.

Interrogatories to RoadRunner B2C, LLC, d/b/a RevGo

DAVID C. SHONKA
Acting General Counsel
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop CC-9528
Washington, DC 20580
Telephone: 202-326-3444 (Waldrop)
Telephone: 202-326-3515 (Schaefer)
Facsimile: 202-326-3197
Email: swaldrop@ftc.gov, mschaefer@ftc.gov

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar No. 4790
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: 702-388-6336
Facsimile: 702-388-6787
Email: blaine.welsh@usdoj.gov

Attorneys for Plaintiff Federal Trade Commission.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	PLAINTIFF FTC'S FIRST SET OF
)	INTERROGATORIES TO DEFENDANT
REVMOUNTAIN, LLC, <i>et al.</i> ,)	ROADRUNNER B2C, LLC, ASLO D/B/A
)	REVGO
Defendants.)	
)	

Plaintiff, Federal Trade Commission, propounds the following First Set of Interrogatories to Defendant Roadrunner B2C, LLC, also d/b/a RevGo ("RevGo") pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure. The Definitions herein are provided for guidance and to reduce the likelihood of any misunderstanding regarding the specific interrogatories set forth below, and are not intended to increase the burden otherwise imposed

by the Federal Rules of Civil Procedure upon the defendant as the responding party. Pursuant to Federal Rule of Civil Procedure 33(b)(2), RevGo must serve the Commission with its responses under oath to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant RevGo is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

DEFINITIONS

A. **"Defendants"** means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.

B. **"Identify," "identifying," and "identification"** mean:

1. When referring to a natural person, state the full name, present business address and telephone number, or if a present business affiliation or

business address is not known, by the last known business and home addresses and business and home telephone numbers;

2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and

3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.

C. “**You**” and “**Your**” mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

INTERROGATORIES

1. Describe the business activities You engage in.

2. Identify all of Your members.

3. Identify all of Your officers.

4. Identify all of Your employees.

5. Identify all products or services You marketed or sold.

6. Identify all of Your websites used to market or sell products or services.

7. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.

8. Identify any contracts You entered with other Defendants.

9. Identify any contracts You have with non-Defendants including suppliers, affiliate marketers, affiliate networks, providers of customer relationship management products or

1 services, web hosting companies, call center providers, telemarketers, companies providing
2 chargeback management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo,
3 RevGuard, LLC, and RevLive!, LLC.

4 10. State the total amount of revenue You have earned in each year since January 1,
5 2010, divided either into periods running from January 1 through December 31 of each year, or
6 into fiscal years as You observed them.

7 11. Identify all sources of Your revenue since January 1, 2010, including by
8 categorizing revenues as obtained from either consumers or businesses, and by identifying each
9 business from which You obtained revenue.

10 12. Identify all of Your clients since January 1, 2010, including the individual(s) who
11 served as points of contact for that client.

12 13. Identify the percentage of revenues You obtained from the other Defendants in
13 each year or fiscal year since January 1, 2010.

14
15 Dated: November 3, 2017

16
17 /s/ Michelle Schaefer
18 SARAH WALDROP
19 MICHELLE SCHAEFER
20 Attorneys for Federal Trade Commission
21
22
23
24
25
26
27
28

Interrogatories to RevGuard, LLC

DAVID C. SHONKA
Acting General Counsel
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop CC-9528
Washington, DC 20580
Telephone: 202-326-3444 (Waldrop)
Telephone: 202-326-3515 (Schaefer)
Facsimile: 202-326-3197
Email: swaldrop@ftc.gov, mschaefer@ftc.gov

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar No. 4790
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: 702-388-6336
Facsimile: 702-388-6787
Email: blaine.welsh@usdoj.gov

Attorneys for Plaintiff Federal Trade Commission.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	PLAINTIFF FTC'S FIRST SET OF
)	INTERROGATORIES TO DEFENDANT
REVMOUNTAIN, LLC, <i>et al.</i> ,)	REVGUARD, LLC
)	
Defendants.)	
)	

Plaintiff, Federal Trade Commission, propounds the following First Set of Interrogatories to Defendant RevGuard, LLC pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure. The Definitions herein are provided for guidance and to reduce the likelihood of any misunderstanding regarding the specific interrogatories set forth below, and are not intended to increase the burden otherwise imposed by the Federal Rules of Civil Procedure upon the defendant as the responding party. Pursuant to Federal Rule of Civil

Procedure 33(b)(2), RevGuard, LLC must serve the Commission with its responses under oath to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant RevGuard, LLC is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

DEFINITIONS

A. **"Defendants"** means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.

B. **"Identify," "identifying," and "identification"** mean:

1. When referring to a natural person, state the full name, present business address and telephone number, or if a present business affiliation or

business address is not known, by the last known business and home addresses and business and home telephone numbers;

2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and

3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.

C. “**You**” and “**Your**” mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

INTERROGATORIES

1. Describe the business activities You engage in.

2. Identify all of Your members.

3. Identify all of Your officers.

4. Identify all of Your employees.

5. Identify all products or services You marketed or sold.

6. Identify all websites You used to market or sell products or services.

7. Identify all of the customer relationship management systems You used to manage Your relationships and interactions with customers and potential customers.

8. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.

9. Identify any contracts You with other Defendants.

10. Identify any contracts You have with non-Defendants including suppliers, affiliate marketers, affiliate networks, providers of customer relationship management products or services, web hosting companies, call center providers, telemarketers, companies providing chargeback management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo, RevGuard, LLC, and RevLive!, LLC.

11. State the total amount of revenue You have earned in each year since January 1, 2010, divided either into periods running from January 1 through December 31 of each year, or into fiscal years as You observed them.

12. Identify all sources of Your revenue since January 1, 2010, including by categorizing revenues as obtained from either consumers or businesses, and by identifying each business from which You obtained revenue.

13. Identify all of Your clients since January 1, 2010, including the individual(s) who served as points of contact for that client.

14. Identify the percentage of revenues You obtained from other Defendants in each year or fiscal year since January 1, 2010.

Dated: November 3, 2017

/s/ Michelle Schaefer
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys for Federal Trade Commission

Interrogatories to RevLive!, LLC

DAVID C. SHONKA
Acting General Counsel
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop CC-9528
Washington, DC 20580
Telephone: 202-326-3444 (Waldrop)
Telephone: 202-326-3515 (Schaefer)
Facsimile: 202-326-3197
Email: swaldrop@ftc.gov, mschaefer@ftc.gov

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar No. 4790
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: 702-388-6336
Facsimile: 702-388-6787
Email: blaine.welsh@usdoj.gov

Attorneys for Plaintiff Federal Trade Commission.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	PLAINTIFF FTC'S FIRST SET OF
)	INTERROGATORIES TO DEFENDANT
REVMOUNTAIN, LLC, <i>et al.</i> ,)	REVLIVE!, LLC
)	
Defendants.)	
)	

Plaintiff, Federal Trade Commission, propounds the following First Set of Interrogatories to Defendant RevLive!, LLC pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure. The Definitions herein are provided for guidance and to reduce the likelihood of any misunderstanding regarding the specific interrogatories set forth below, and are not intended to increase the burden otherwise imposed by the Federal Rules of Civil Procedure upon the defendant as the responding party. Pursuant to Federal Rule of Civil Procedure

33(b)(2), RevLive!, LLC must serve the Commission with its responses under oath to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant RevLive!, LLC is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

DEFINITIONS

A. **"Defendants"** means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.

B. **"Identify," "identifying," and "identification"** mean:

1. When referring to a natural person, state the full name, present business address and telephone number, or if a present business affiliation or business address is not known, by the last known business and home addresses and business and home telephone numbers;

2. When referring to any other entity, such as a business or organization, state the legal name as well as any other names under which the entity has done business, as well as the address, telephone number and contact person; and

3. When referring to a document, state the full name(s) of the author(s) or preparer(s), the full name of the recipient(s), addressee(s), and/or person(s) designated to receive copies, the title or subject line of the document, a brief description of the subject matter of the document, the date it was prepared, its present location, and its present custodian.

C. “**You**” and “**Your**” mean the Defendant responding to this request, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

INTERROGATORIES

1. Describe the business activities You engage in.
2. Identify all of Your members.
3. Identify all of Your officers.
4. Identify all of Your employees.
5. Identify all products or services Your marketed or sold.
6. Identify all websites You used to market or sell products or services.
7. Identify all of the customer relationship management systems You used to manage Your relationships and interactions with customers and potential customers.
8. Describe the relationship, if any, between You and the other Defendants. For example, state whether any other Defendant owns a portion of You (and if so, identify such Defendant and its percentage ownership stake in You), conducts business with You, or has contracts with You.
9. Identify any contracts You entered with other Defendants.
10. Identify any contracts You have with non-Defendants including suppliers, affiliate marketers, affiliate networks, providers of customer relationship management products or

1 services, web hosting companies, call center providers, telemarketers, companies providing
2 chargeback management services, and clients of RoadRunner B2C, LLC, d/b/a RevGo,
3 RevGuard, LLC, and RevLive!, LLC.

4 11. Identify all of Your clients since January 1, 2010, including the individual(s) who
5 served as points of contact for that client.

6 12. State the total amount of revenue You have earned in each year since January 1,
7 2010, divided either into periods running from January 1 through December 31 of each year, or
8 into fiscal years as You observed them.

9 13. Identify all sources of Your revenue since January 1, 2010, including by
10 categorizing revenues as obtained from either consumers or businesses, and by identifying each
11 business from which You obtained revenue.

12 14. Describe Your policies or practices for recording telephone calls from consumers,
13 including retention policies for the recordings.

14 15. Identify all employees with responsibilities related to reviewing or responding to
15 consumer complaints.

16 16. Identify all employees with responsibilities related to drafting or editing call
17 scripts.

18 17. Identify all of Your clients since January 1, 2010, including the individual(s) who
19 served as points of contact for that client.

20 18. Identify the percentage of revenues You obtained from the other Defendants in
21 each year or fiscal year since January 1, 2010.

22
23 Dated: November 3, 2017

24
25 /s/ Michelle Schaefer
26 SARAH WALDROP
27 MICHELLE SCHAEFER
28 Attorneys for Federal Trade Commission

Interrogatories to Blair McNea

DAVID C. SHONKA
Acting General Counsel
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mailstop CC-9528
Washington, DC 20580
Telephone: 202-326-3444 (Waldrop)
Telephone: 202-326-3515 (Schaefer)
Facsimile: 202-326-3197
Email: swaldrop@ftc.gov, mschaefer@ftc.gov

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Assistant United States Attorney
Nevada Bar No. 4790
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: 702-388-6336
Facsimile: 702-388-6787
Email: blaine.welsh@usdoj.gov

Attorneys for Plaintiff Federal Trade Commission.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	PLAINTIFF FTC'S FIRST SET OF
)	INTERROGATORIES TO DEFENDANT
REVMOUNTAIN, LLC, <i>et al.</i> ,)	BLAIR MCNEA
)	
Defendants.)	
)	

Plaintiff, Federal Trade Commission, propounds the following First Set of Interrogatories to Defendant Blair McNea pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure. The Definitions herein are provided for guidance and to reduce the likelihood of any misunderstanding regarding the specific interrogatories set forth below, and are not intended to increase the burden otherwise imposed by the Federal Rules of Civil Procedure upon the defendant as the responding party. Pursuant to Federal Rule of Civil Procedure

33(b)(2), Blair McNea must serve the Commission with its responses to these interrogatories, including any objections thereto, on or before December 4, 2017. Furthermore, Defendant Blair McNea is hereby notified that the FTC may move at the commencement of trial to preclude Defendants from presenting evidence regarding responsive matters they have failed to disclose in response to the FTC's requests for interrogatory responses.

DEFINITIONS

A. **"Defendants"** means RevMountain, LLC; RoadRunner B2C, LLC, d/b/a RevGo; Wave Rock, LLC; Juniper Solutions, LLC; Jasper Woods, LLC; Wheeler Peak Marketing, LLC; ROIRunner, LLC; Cherry Blitz, LLC; Flat Iron Avenue, LLC; Absolutely Working, LLC; Three Lakes, LLC; Bridge Ford, LLC; How and Why, LLC; Spruce River, LLC; TrimXT, LLC; Elation White, LLC; IvoryPro, LLC; Doing What's Possible, LLC; RevGuard, LLC; RevLive!, LLC; Blue Rocket Brands, LLC; Convertis, LLC; Convertis Marketing, LLC; Turtle Mountains, LLC; Boulder Black Diamond, LLC; Mint House, LLC; Thunder Avenue, LLC; University & Folsom, LLC; Boulder Creek Internet Solutions, Inc.; Walnut Street Marketing, Inc.; Snow Sale, LLC; Brand Force, LLC; Wild Farms, LLC; Salamonie River, LLC; Indigo Systems, LLC; Night Watch Group, LLC; Newport Crossing, LLC; Greenville Creek, LLC; Brookville Lane, LLC; Anasazi Management Partners, LLC; Honey Lake, LLC; Condor Canyon, LLC; Brass Triangle, LLC; Solid Ice, LLC; Sandstone Beach, LLC; Desert Gecko, LLC; Blizzardwhite, LLC; Action Pro White, LLC; First Class Whitening, LLC; Spark Whitening, LLC; Titanwhite, LLC; Dental Pro At Home, LLC; Smile Pro Direct, LLC; Circle of Youth Skincare, LLC; DermaGlam, LLC; Sedona Beauty Secrets, LLC; Bellaathome, LLC; SkinnyIQ, LLC; Body Tropical, LLC; Blair McNea; Jennifer Johnson; and Danielle Foss.

B. **"Identify," "identifying," and "identification"** mean:

1. When referring to a natural person, state the full name, present business address and telephone number, or if a present business affiliation or business address is not known, by the last known business and home addresses and business and home telephone numbers;

1 2. When referring to any other entity, such as a business or organization,
2 state the legal name as well as any other names under which the entity
3 has done business, as well as the address, telephone number and contact
4 person; and

5 3. When referring to a document, state the full name(s) of the author(s) or
6 preparer(s), the full name of the recipient(s), addressee(s), and/or
7 person(s) designated to receive copies, the title or subject line of the
8 document, a brief description of the subject matter of the document, the
9 date it was prepared, its present location, and its present custodian.

10 C. **“You”** and **“Your”** mean the Defendant responding to this request, and all
11 directors, officers, employees, agents, consultants, and other persons working for or on behalf of
12 the foregoing.

13 **INTERROGATORIES**

14 1. Describe the relationship between You and the other Defendants. For example,
15 state whether You own a portion of any Defendant (and if so, identify such Defendant and Your
16 percentage ownership stake in it), conduct business with any Defendant, or have contracts with
17 any Defendant.

18 2. Identify any contracts You entered with other Defendants.

19 3. State the total amount of revenue You have earned in each year since January 1,
20 2010, divided either into periods running from January 1 through December 31 of each year, or
21 into fiscal years as XXXX observed them.

22 4. Identify all sources of Your revenue since January 1, 2010, including by
23 categorizing revenues as obtained from either consumers or businesses, and by identifying each
24 business from which You obtained revenue.

Dated: November 3, 2017

/s/ Michelle Schaefer
SARAH WALDROP
MICHELLE SCHAEFER
Attorneys for Federal Trade Commission